

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Terry Nelson and Gary Larson, as Trustees of the Painters and Allied Trades District Counsel No. 82 Health Care Fund and the Painters and Allied Trades District Counsel No. 82 Vacation Fund; Terry Nelson and William Grimm, as Trustees of the Minneapolis Local 386 Drywall Finishing Industry Pension Fund; Terry Nelson and Gary Larson, as Trustees of the Minneapolis Paining Industry Pension Fund; Terry Nelson and Robert Swanson, as Trustees of the Minnesota Finishing Trades Training Funds; and each of their successors,

Case No. 09-CV-1429
(PJS/SRN)
Case No. 09-CV-2406
(PJS/SRN)

Terry Nelson and John Nakasone, as Trustees of the St. Paul Painting Industry Pension Fund; and each of their successors,

DEFENDANTS' RESPONSE TO
PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT

Plaintiffs,

vs.

Spectrum Custom Designs, Inc. and Jorge Restrepo, individually,

Defendants.

Defendants Spectrum Custom Designs, Inc., and Jorge Restrepo (collectively, "Defendants") submit this response to Plaintiffs' Motion for Summary Judgment to inform the Court that Defendants do not oppose the Motion. Accordingly, Defendants will work with Plaintiffs to enter into a stipulation for judgment to be submitted for the Court's consideration.

Dated: April 29, 2011

s/ Leah C. Janus

James L. Baillie (#3980)

Steven Z. Kaplan (#53739)

Leah C. Janus (#337365)

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